

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

THEODOROS BAHTSEVANOS

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No. 1:19-cr-____ - ____

INDICTMENT

The Grand Jury charges:

COUNT ONE

Misuse of a DEA Registration Number
21 U.S.C. §§ 843(a)(2) & 846

On or about May 13, 2018, in the District of New Hampshire, the defendant,

THEODOROS BAHTSEVANOS,
a/k/a PATRICK SPRINGER

knowingly and intentionally used the DEA registration number issued to another person for the purpose of attempting to acquire and obtain a controlled substance, specifically, Adderall.

All in violation of Title 21, United States Code, Sections 843(a)(2) and 846.

COUNT TWO

Misuse of a DEA Registration Number
21 U.S.C. §§ 843(a)(2) & 846

On or about May 14, 2018, in the District of New Hampshire, the defendant,

THEODOROS BAHTSEVANOS,
a/k/a MARCUS CAVANAUGH

knowingly and intentionally used the DEA registration number issued to another person for the purpose of attempting to acquire and obtain a controlled substance, specifically, Adderall.

All in violation of Title 21, United States Code, Sections 843(a)(2) and 846.

COUNT THREE

Possession of Five or More False Identification Documents
18 U.S.C. § 1028(a)(3)

On or about May 14, 2018, in the District of New Hampshire, the defendant,

THEODOROS BAHTSEVANOS,
a/k/a MARCUS CAVANAUGH,
a/k/a PATRICK SPRINGER,
a/k/a LANCE MANN,
a/k/a SETH MAPPLE,
a/k/a SAM CAMP,
a/k/a JOSHUA GABLE,
a/k/a CONNOR APPLE
a/k/a CHRISTOPHER HAMILTON
a/k/a LYLE PALMER

knowingly and intentionally possessed with intent to use unlawfully five or more false identification documents, specifically, false driver's licenses purportedly issued by states other than New Hampshire, the possession of which was in or affected interstate commerce. The defendant possessed the false identification documents with the intent to use them illegally to acquire controlled substances from retail pharmacies.

All in violation of Title 18, United States Code, Section 1028(a)(3).

A TRUE BILL

/s/ Grand Jury Foreperson
FOREPERSON

Dated: January 9, 2019

SCOTT W. MURRAY
UNITED STATES ATTORNEY

By: /s/ Charles L. Rombeau
Charles L. Rombeau
Assistant U.S. Attorney